**Privacy Policy**

This document contains the information provided by **NEOX Smart Solutions Zrt.**. (hereinafter referred to as NEOX or the Data Controller) regarding data processing for marketing purposes.

This Privacy Policy has been prepared in accordance with the rules of the General Data Protection Regulation 2016/679 (hereinafter referred to as the Regulation).

Name, contact details:

*Name: NEOX Smart Solutions Zrt.*

*Headquarters: 1037 Budapest, Erdőalja köz 6.*

*Email Address:* *contact@neox.team*

**1. The scope of the data processed, the legal basis and purpose of data processing, and the duration of data processing**

**Data processing for marketing purposes**

NEOX provides the opportunity for the Data Subject to consent to data processing for marketing purposes on several platforms.

Within the framework of data processing for marketing purposes, NEOX processes the Data Subject's name, phone number, e-mail address, position and the name of the place of work.

Within the framework of data processing for marketing purposes, NEOX sends a professional newsletter and contacts the Data Subject with the recommendation of its own services. Thus, the purpose of data processing is to transfer professional knowledge to the Data Subject and to establish a business relationship.

**Legal basis of data processing**

The legal basis of the data processing is the consent of the Data Subject pursuant to Article 6 (1) a) of the Regulation.

**Duration of data processing**

NEOX processes the data until the consent is withdrawn.

**2. Rights of the Data Subject in relation to data processing**

Within the period of data processing, the Data Subject is entitled to the following rights in accordance with the provisions of the Regulation:

* Access to personal data and request information about data processing
* Right to rectification
* Restriction of data processing
* Right to erasure
* Right to object

If the Data Subject wishes to exercise his rights, it involves the identification of the Data Subject, and communication with the Data Subject must be necessary, therefore personal data will be required for identification (but identification may only be based on data that NEOX processes anyway).

NEOX will respond to complaints related to data processing within 30 days at the latest.

**Access to Personal Data and Information**

The Data Subject has the right to receive feedback on whether the processing of his/her personal data is in progress and, if the data processing is in progress, he/she has the right to:

* access to the personal data processed, and
* For information on the following information::
	+ Purposes of data processing
	+ categories of personal data processed about the Data Subject
	+ information about the recipients or categories of recipients to whom NEOX has disclosed or will disclose personal data
	+ the planned period for which the personal data will be stored or, if this is not possible, the criteria for determining this period
	+ the right of the Data Subject to request the rectification, erasure or restriction of the processing of personal data concerning the Data Subject and, in the case of processing based on legitimate interest, to object to the processing of such personal data
	+ the right to lodge a complaint with a supervisory authority
	+ where the data was not collected from the Data Subject, all available information on their source
	+ the fact of automated decision-making (if such a procedure is used), including profiling, and, at least in these cases, the information available on the logic used and the significance of such processing and the expected consequences for the Data Subject

The purpose of exercising the right may be to establish and verify the lawfulness of data processing, therefore, in the event of multiple requests for information, NEOX may charge a reasonable fee in exchange for the provision of information.

NEOX provides access to personal data by sending the processed personal data and information to the Data Subject by e-mail after identifying the Data Subject.

The Data Subject must indicate in the request whether he or she requests access to the personal data or information related to data processing.

**Right to rectification**

The Data Subject has the right to have inaccurate personal data concerning him or her rectified without delay at his or her request.

**Right to restriction of processing**

The Data Subject shall have the right to obtain the restriction of data processing by NEOX at his request, if one of the following applies:

* the Data Subject contests the accuracy of the Personal Data, in which case the restriction applies to the period that allows NEOX to verify the accuracy of the Personal Data; if the verification is not necessary, NEOX will not apply any restriction
* the processing is unlawful and the Data Subject opposes the deletion of the data and instead requests the restriction of their use
* the personal data are no longer needed for the purpose of the indicated data processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims
* The Data Subject has objected to the data processing, but the legitimate interest of NEOX may also justify the data processing, in which case until it is established whether the legitimate grounds of NEOX take precedence over the legitimate grounds of the Data Subject, the data processing must be restricted

Where processing is restricted, such personal data, with the exception of storage, may only be processed with the consent of the Data Subject, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

NEOX shall inform the Data Subject in advance (at least 3 working days prior to the lifting of the restriction) of the lifting of the restriction of data processing.

**Right to erasure - to be forgotten**

The Data Subject shall have the right to obtain the erasure of personal data concerning the Data Subject by NEOX without undue delay if one of the following reasons applies:

* the personal data is no longer necessary for the purpose for which it was collected or processed by NEOX
* The Data Subject withdraws his/her consent and there is no other legal basis for the data processing
* The data subject objects to the processing based on legitimate interest and there is no overriding legitimate reason (i.e. legitimate interest) for the processing
* the personal data was unlawfully processed by NEOX and this was established on the basis of the complaint
* the personal data must be erased in order to comply with a legal obligation under Union or Member State law applicable to NEOX

If, for any legitimate reason, NEOX has disclosed the personal data processed about the Data Subject and NEOX is obliged to delete it for any of the reasons indicated above, NEOX will take reasonable steps, including technical measures, taking into account the available technology and the costs of implementation, in order to inform the other controllers processing the data that the Data Subject has requested the provision of links to the personal data in question or a copy of such personal data, or the deletion of a duplicate of the Society. As a general rule, NEOX does not disclose the personal data of the Data Subject.

Deletion does not apply if the data processing is necessary:

* for the purpose of exercising the right to freedom of expression and information
* to comply with an obligation under EU or Member State law applicable to NEOX requiring the processing of personal data
* for the establishment, exercise or defence of legal claims

**Right to object**

The data subject has the right to object at any time to the processing of his or her personal data based on legitimate interest for reasons relating to his or her particular situation. In this case, NEOX may no longer process the personal data, unless it proves that the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the Data Subject or which are related to the establishment, exercise or defence of legal claims.

**Legal remedies**

If the Data Subject believes that NEOX has violated any legal provision relating to data processing or has not complied with any of its requests, it may initiate an investigation procedure of the National Authority for Data Protection and Freedom of Information in order to terminate the presumed unlawful data processing (postal address: 1530 Budapest, Pf.: 5., e-mail: ugyfelszolgalat@naih.hu).

NEOX hereby also informs the Data Subject that he may also file a civil lawsuit before the court.

**3. Data Security**

In the course of the operation of the IT systems, NEOX ensures that the data of the Data Subject cannot be obtained by unauthorized persons, and that unauthorized persons cannot delete, save or modify the data. NEOX enforces data protection and data security requirements with its data processors as well.

NEOX keeps a record of any personal data breaches and, if necessary, informs the Data Subject of any incidents that arise.

**4. Other provisions**

NEOX reserves the right to amend this Privacy Policy in a way that does not affect the purpose and legal basis of data processing.

This Privacy Policy is effective from 01 September 2024.